

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Bair Hugger Forced Air Warming
Devices Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates to:
ALL CASES

**DECLARATION OF BENJAMIN
W. HULSE IN SUPPORT OF
DEFENDANTS' SECOND RULE 37
MOTION TO BAR PLAINTIFFS'
GENERAL CAUSATION EXPERT
OPINIONS**

Benjamin W. Hulse, being first duly sworn, deposes, and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys who represents 3M Company and Arizant Healthcare Inc. (together, "Defendants") in this litigation. I submit this declaration in support of Defendants' Second Rule 37 Motion to Bar Plaintiffs' General Causation Expert Opinions. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Exhibit A is a true and correct copy of Nathan Bushnell's Report, served January 25, 2019.
2. Attached as Exhibit B is a true and correct copy of Yadin David's Supplemental Report *sans* exhibits, served January 25, 2019.
3. Attached as Exhibit C is a true and correct copy of excerpts from the transcript of the September 6, 2018 MDL motion hearing.
4. Attached as Exhibit D is a true and correct copy of the meet-and-confer email concerning the instant motion that I sent to Plaintiffs' counsel on January 29, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, Minnesota, this 1st day of February, 2018.

s/Benjamin W. Hulse

Benjamin W. Hulse